

M/D 1

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA**RECEIVED**Charles Edward BrownHenry County JailFull name and prison name of
Plaintiff(s)

v.

Lee PadgettBecky FloydGracie NolinName of person(s) who violated your
constitutional rights. (List the names
of all the person.)

2020 FEB -4 P 12: 27

DEBRA P. HACKETT, CLK

U.S. DISTRICT COURT

MIDDLE DISTRICT ALA

CIVIL ACTION NO. 1:20-cv-81-ECM-SRW
(To be supplied by Clerk of U.S. District
Court)**DEMAND FOR JURY TRIAL**

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ☒ No ☐
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ☒ NO ☐
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) Charles Edward Brown

1:19-cv-00382
Defendant(s) 1:19-cv-682-ECM • 1:19-cv-1076-ECM
1:19-cv-363-WHA-CSC • 1:19-cv-603-ALB-CSC

2. Court (if federal court, name the district; if state court, name the county)

Middle

3. Docket number N/A
4. Name of judge to whom case was assigned 1076/682 WALLACE Capt, Jr
382/603/363 Charles S. Caddy
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) All Still Pending
6. Approximate date of filing lawsuit mid to late 2019
7. Approximate date of disposition _____

II. PLACE OF PRESENT CONFINEMENT Henry County Jail

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED _____

Henry County Jail

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	<u>Lee Padgett</u>	<u>101 Court Sq Room G Abbeville, AL 36310</u>
2.	<u>Betsy Floyd</u>	<u>101 Court Sq Room G Abbeville AL 36310</u>
3.	<u>Grace Ndini</u>	<u>101 Court Sq Room G Abbeville AL 36310</u>
4.	_____	_____
5.	_____	_____
6.	_____	_____

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 1.7.20,
11-15-19, 12-15-19, 1.20.20

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Attorney/Client Privacy

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

ON 1.7.20 I received a visit from my Attorney Jennice Wilson around 4pm. C/O Nolin (shift supervisor) set that visit up to take place in the Booking/Intake room. About 20 mins into the visit C/O Carmen came to the door and asked could she feed a inmate that was in the holding cell which is adjacent to the

GROUND TWO: Booking/Intake Room. Hon. Jennice Wilson or I had any idea anyone was in the holding cell. I was very upset and disturbed by this and so was Hon. Jennice Wilson. When

SUPPORTING FACTS: I addressed my complaint to staff C/O Johnson said "so it's not like he was listening he's intoxicated." When the door was popped to give the inmate (Cody Wilkerson) his tray he was standing right at the door. Who knows what he heard, but I've all know you cannot unheard what's been heard. Another Gross Administrative Misconduct that

GROUND THREE: knows no bound.

Next is the Misconduct of the Administration that SUPPORTING FACTS: ROBS you of due process, and deprive one of rights guaranteed by the US Constitution.

I have filed several grievances including one about the aforementioned matter (dates on page 2). In the handbook it says you must go through the chain of command. I have request numerous times the name & rank of all in chain of command with no reply. The Handbook also states that grievances will be answered in writing within 72 hrs excluding holidays & weekend. Every grievance I file is never answered only returned with Forwarded or Request Received robbing me of due process. I also have not been returned serial request form from Records clerk Becky Floyd. I have filed grievance about it and told her and the Administration I need request forms returned because of pending legal actions.

- VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

I request a jury trial. Something has to be
done and I leave that to the courts.
Without a change in this Rogue Administration
A TRAVESTY of Justice is surely forecoming

Charles Brown
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2.3.2020
(Date)

Charles Brown
Signature of plaintiff(s)

Charles Brown
101 Court Sq Room 6
Abbeville, AL 36310

MONTGOMERY AL 360

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MAIL ORIGINATED FROM
THE HENRY COUNTY JAIL

Hon. Wallace Capel Jr
US Clerk Debra P. Hackett
ONE Church Street Room B-110
Montgomery, AL 36104

Legal Correspondence
To Be Opened By
Addressee only.

36104-401801

